

OVED & OVED

ATTORNEYS

January 4, 2023

VIA ECF

Hon. Paul A. Engelmayer
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Avara Pharmaceutical Services Ltd. et al v. JPMorgan Chase Bank, N.A.*, Case No. 1:22-cv-09494-PAE

Dear Judge Engelmayer:

This law firm represents Plaintiffs Avara Pharmaceutical Services, Ltd.; Avara Holdings, Ltd.; Avara Pharmaceutical Technologies, Inc.; and Alliance Manufacturing and Trading Company, Ltd. (collectively, “Plaintiffs”) in the above-captioned matter. We write, with defendant JPMorgan Chase Bank, N.A.’s (“JPM”) consent, to respectfully request that the Court stay this action—including all deadlines related to JPM’s recently-filed motion to dismiss Plaintiffs’ complaint—for a period of 45 days.

The parties have agreed to mediate the dispute underlying this action and the related action in Oklahoma state court. The parties seek an immediate stay of this action to allow them to complete the mediation before incurring additional legal fees or requiring any court to expend additional judicial resources adjudicating the dispute. The parties request that this action be stayed until the earlier of (1) February 13, 2023, or (2) 25 days after any party requests that the stay be lifted. The parties will provide a status report to the Court no later than February 8, 2023, indicating whether the dispute has been resolved or an extension of the stay is necessary to allow them to complete the mediation process.

The parties have agreed to appoint Judge Carey as mediator for this dispute and have contacted him concerning his willingness and ability to accept this appointment. Judge Carey has indicated that he is available to mediate the dispute before the expiration of the requested stay.

Accordingly, the parties jointly request that this litigation be stayed until February 13, 2023, and that all existing and future case deadlines be tolled as of the date of the filing of this motion.

We thank the Court for its time and attention to this matter.

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Respectfully submitted,

/s/ Glen Lenihan

Glen Lenihan

cc.: All counsel of record (via ECF)